

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: CHRISTY MARIE STINEBERT Debtor	:	CHAPTER 13
	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
CHRISTY MARIE STINEBERT	:	
Respondent	:	CASE NO. 1-24-bk-02254

TRUSTEE’S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 10th day of October, 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)’ plan for the following reason(s):

1. Debtor’s plan violates 11 U.S.C. §§ 1322(a)(1) and 1325(b) in that the debtor has not submitted all or such portion of the disposable income to the Trustee as required. More specifically,

Trustee alleges and avers that debtor’s disposable income is greater than that which is committed to the plan based upon the Means Test calculation and specifically disputes the following amounts:

- a. Line 46 should provide for an increase in income from that reported on Line 2.
- b. Line 13 of the 122C-1 Form does not match the amounts listed for the non-filing spouse’s expenses as shown on Schedule J.
- c. Line 16 (tax expense) is overstated.
- d. Line 35 should be \$0.

2. Failure to properly state the minimum amount to be paid to unsecured creditors in Section 1.A.4. of the plan, as required by the Mean Test.

3. Debtor’s plan violates 11 U.S.C. § 1325(b)(1) in that the plan does not provide for the payment of all of the debtor’s projected disposable income for a minimum period of five years.

4. SOFA #27 lacks description.

5. Trustee avers that debtor's plan cannot be administered due to the lack of the following:

- a. Pay stubs for the months of August and September 2024 for non-filing spouse.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 11th day of October, 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Chad Julius, Esquire
8150 Derry Street, Suite A
Harrisburg, PA 17111

/s/Deborah A. DePalma
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee